



PO Box 2027 • Minot, ND 58702
701-858-1200 • 1-800-737-9130

A SUBSIDIARY OF SRT COMMUNICATIONS, INC.

November 9, 2005

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

Fourth Semi-Annual Report

Dear Ms. Dortch:

The Filer, North Dakota Network Co. ("NDNC") is the licensee of Stations KNLH232 (D-Block – Minot, North Dakota BTA), and KNLH234 (F-Block – Minot, North Dakota BTA) in the broadband Personal Communications Service. This report is submitted pursuant to the requirements of Paragraph Nos. 89-91 of the Commission's Report and Order (WT Docket No. 01-309) FCC 03-168, released August 14, 2003 ("R&O").

By way of background, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer's wireless system employs a CDMA air interface. The Filer currently markets six (6) models of digital wireless handsets. According to information obtained from the Cellular Telecommunications and Internet Association ("CTIA") Access Wireless web site (www.access.wireless.org) and the ATIS HAC Incubator, while there are handsets and devices designed to reduce interference with hearing aids, we have confirmed that as of April 2005, there are no digital wireless handsets commercially available that meet ANSI Standard C63.19.

To achieve compliance with the requirements of the R&O, the Filer is at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

Item 1: Digital Wireless Phones Tested – None. As described above, the Filer is a small carrier that is not involved in the handset development or testing process. The Filer will rely on testing performed by the handset manufacturers.

Item 2: Laboratory Used – None. See Response to Item 1.

Item 3: Test Results for Each Phone Tested – Not applicable. See Response to Item 1.

Item 4: Identification of Compliant Phone Models and Ratings According to ANSI C63.19
The Filer has not identified any commercially available CDMA handsets that meet a U3 rating under ANSI Standard C63.19.

Item 5: Report on the Status of Product Labeling – The Filer is not involved in product labeling or the development of labeling standards. However, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. While the 2001 version of the C63.19 standard uses a “U” rating for radio frequency (RF) immunity and a “UT” rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (i.e., specifying “M” for Microphone and “T” for T0Coil). Because the revised labeling protocols are more likely to alleviate consumer confusion, we support industry requests for clarification that the 2005 labeling standards (the “M” and “T” ratings) can and should be used to designate HAC compatibility.¹

Item 6: Report on Outreach Efforts – The Filer has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the Filer’s employees and retail sales force about HAC-related issues and possible solutions.

Item 7: Information Related to Retail Availability of Compliant Phones – Upon information and belief, there are currently no handsets commercially available that meet a U3 rating under ANSI Standard C63.19. The Filer also offers two models of headsets from Plantronics (models M114 and M135) which, according to the manufacturer, are HAC compatible and may be used with any model of digital handset.

Item 8: Information Related to Incorporating Hearing Aid Compatibility Features Into Newer Models of Digital Wireless Phones – The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9: Any Activities Related to ANSI 63.19 or Other Standards Work Intended to Promote Compliance with the Requirements of the Commission’s Report and Order – None. The Filer is a small carrier that is not involved in standards development.

¹ See Ex Parte presentation by ATIS in WT Docket No. 01-309, (dated May 5, 2005).

HAC Fourth Semi-Annual Report
November 9, 2005
Page 3

Item 10: Total Numbers of Compliant and Non-Compliant Phone Models Offered as of the Date of this Report - As noted above, the Filer currently offers six (6) different models of CDMA handsets. Currently, four (4) out of the six (6) phones the Filer sells are HAC-M3 compliant. Upon information and belief, none of these handsets meet a U3 rating under ANSI Standard C63.19.

Item 11: Any Ongoing Efforts for Interoperability Testing with Hearing Aid Devices – None. The Filer is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,
NORTH DAKOTA NETWORK CO.



John A. Reiser
Chief Operations Officer/Assistant Manager

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